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Subject: PtId Harbor, EA talking points
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Hello everyone,

To follow up on our TCT call this past Wednesday as requested by ODEQ, here are the talking points we've been using in recent meetings. Please let me know if you have any questions.

Thank you.

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Global points-

- Early action work has included in water removal of contaminated sediments, but also collection of substantial, additional data at known hot spots that will help inform the Portland Harbor Feasibility study, and also will speed up post ROD design efforts to allow hot spots to be cleaned up as quickly post ROD as possible.
- EPA is directing internal resources to completing the harborwide FS as quickly as possible.
- It is important to ensure that early action work supports the Portland Harbor remedy selection process and does not conflict with it or divert attention away from finalizing the RI/FS.

Work that will continue until the ROD is issued, is recontamination analysis and review of upland source control work, which is critical for every hot spot site to ensure that work is as compatible as possible with what is contemplated in water under the ROD.

Site specific

T4

- Phase I removal work in 2008 addressed the highest risk hot spots.
- Monitoring work continues as well as mitigation for phase I removal dredging/capping work.
- 60% design information on a CDF in Slip 3 is being incorporated into the FS and administrative record as needed. This work is the reason a clear picture of the CDF concept exists for public consideration. Performance standards for this design are the highest of its kind to date in the NW.

Arkema

- Substantial data has been collected that will inform the alternatives evaluation in the Portland Harbor FS.
- The schedule for finalizing the RI/FS and issuing the ROD has overtaken performance of any early cleanup work at the Arkema site, therefore, there is no purpose for continued efforts to revise the EE/CA, and both parties have agreed that an EE/CA is no longer required under the AOC.
- While recontamination work is critical to go forward, if LSS doesn't support this via the AOC, it will proceed separately.

Gasco

- Fifteen thousand cubic yards of tar was removed from the river in 2005.
- A significant amount of additional data has been collected which will inform the alternatives evaluation in the Portland Harbor FS, and facilitate design work to happen more quickly post ROD.
- Recontamination work is continuing to ensure upland s/c is compatible with in water work. EPA has spent substantial time with the state in looking at groundwater treatment at the site, to mitigate the flux from a substantial upland source.
- There is interest in continuing the AOC work through to design, when appropriate by both EPA and the respondents.

The schedule for finalizing the RI/FS and issuing the ROD has overtaken the need for an EE/CA at the GASCO site. Therefore, there is no purpose for continue efforts to revise the EE/CA, and both parties have agreed that an EE/CA is no longer required under the AOC.

- Currently tasks are being segmented into what might be able to continue at each stage of the FS and ROD process.
- While an EE/CA will not be needed for the site, some other deliverable may be needed to continue to the eventual design process under the AOC.

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- Data continues to be collected to support the harborwide process (admin record incorporation). This early work will ensure that this hot spot is cleaned up as early as possible post ROD.
- Field work will likely occur through the fall will both provide information on PCB surface concentrations, dioxin/furan concentrations, but also relative bioavailability of the PCBs across the site.

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